

**From:** [Palma, Elizabeth](#)  
**To:** [Palma, Elizabeth](#)  
**Subject:** 20\_Mass. DEP emissions comments on NODA\_2017 etc emails  
**Date:** Friday, October 12, 2018 10:32:27 AM

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**From:** Santlal, Kenneth (DEP) [<mailto:Kenneth.Santlal@MassMail.State.MA.US>]  
**Sent:** Monday, April 24, 2017 5:00 PM  
**To:** Eyth, Alison <[Eyth.Alison@epa.gov](mailto:Eyth.Alison@epa.gov)>  
**Cc:** Snyder, Jennifer <[Snyder.Jennifer@epa.gov](mailto:Snyder.Jennifer@epa.gov)>; Mason, Rich <[Mason.Rich@epa.gov](mailto:Mason.Rich@epa.gov)>; Susan McCusker <[smccusker@marama.org](mailto:smccusker@marama.org)>; [mark.wert@state.ma.us](mailto:mark.wert@state.ma.us)  
**Subject:** RE: Mass. DEP emissions comments on NODA

Hi Alison,  
Thank you for getting back to us on this. It seems like such a long time I did this analysis for the NODA (Dec 2015) that I could not recall it.  
This confirms that Susan should use the latest estimates i.e., version ek that involved zeroing out the emissions for several counties (and increasing Suffolk County –Boston).  
I plan to submit this nonpoint category to NEI by the May 31 deadline using the same method for 2014.  
I appreciate you digging this up for us and hope it didn't take up too much of your time.  
Thanks  
Ken

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**From:** Eyth, Alison [<mailto:Eyth.Alison@epa.gov>]  
**Sent:** Monday, April 24, 2017 4:24 PM  
**To:** Santlal, Kenneth (DEP)  
**Cc:** Snyder, Jennifer; Mason, Rich; Susan McCusker  
**Subject:** FW: Mass. DEP emissions comments on NODA

Dear Ken,

I was forwarded the questions I pasted in bold below, some of which are about 2011ek and some about 2014. This email also forwards back to you what was sent to use for implementation into 2011ek based on comments you had expressed to use in response to a NODA. I think you can probably answer some of your questions using the attached spreadsheet. However, please do let us know if you feel that we incorrectly folded the information you provided into 2011ek...

Regarding 2014, in your December, 2016 email you stated that you would apply a similar approach for 2014 and submit your own the bulk plant emissions but accept EPA's for pipeline emissions. Although I'm not sure if that is what actually happened (I'm not on the NEI team). Keep in mind that the 2014 development is independent of what was done in 2011. So, things that were addressed as part of the 2011 comments and responses would not have been folded into 2014. They would instead need to be updated as part of the 2014 NEI submission process. So the answer to your question "if ek is accurate, would the adjustment be made for 2014" is: no, there are no adjustments to 2014 made as a result of the 2011 comments.

Generally, we can't tell you which emissions are accurate for modeling – you would need to assess this from your own understanding of that source category in your state. We did try to adjust the emissions to match what you gave us in 2011, but for 2014 you would have had to submit the emissions you wanted into the NEI.

**Hi Jennifer, Rich, Jonathan & David,**

**I tried to answer Susan's questions below about the county adjustment of 2011 Bulk Plant emissions (25-01-055-120) from Versions 1 and 6 to the recent version 'ek'. Since MA accepted EPA's emissions for this category, I thought I'd defer Susan's questions to you. I clipped the emissions from the EPA-FTP sites for both versions 1 and 6. I also clipped the 2014 method and emissions from the EPA Sharepoint site to understand the estimation method and the recent county adjustment in 2011 version ek.**

**The overriding questions are:**

- 1. Why are the emissions zeroed out in the 2011 'ek' version for counties 1,5,9,11,15, 19,23 & 27 but not in Sharepoint 2014?**
- 2. Why were emissions adjusted downwards for counties 13,17 & 21 and drastically upwards for county 25 for 2011 version ek? Why no adjustment for 2014?**

**Please confirm to Susan whether the latest ek version emissions is accurate for modeling, and if not, what the emissions should be. Also, if the ek version is accurate, would the adjustment be made for 2014 in EPA Sharepoint also?**

**If you could address these questions by Tuesday May 1, that would be great.**

**Thanks**

**Ken**

Please let me know if you have further questions,

Alison

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**From:** Santlal, Kenneth (DEP) [<mailto:Kenneth.Santlal@MassMail.State.MA.US>]

**Sent:** Wednesday, December 16, 2015 6:09 PM

**To:** Eyth, Alison <[Eyth.Alison@epa.gov](mailto:Eyth.Alison@epa.gov)>

**Cc:** [mark.wert@state.ma.us](mailto:mark.wert@state.ma.us)

**Subject:** RE: Mass. DEP emissions comments on NODA

Alison,

Attached is the adjusted 2011 EPA Area source Gasoline Bulk Plants/Terminals VOC emissions for MA by subtracting the point sources (scc 25-01-055-120, NAICS 424710).

I have allocated the emissions to counties with point source emissions as shown in the attachment. The Pipelines emissions of 2,820 tons remain the same as there are no related point source emissions (scc 25-05-040-120, NAICS 486910).

I'll follow the same procedure for 2014 – I'll submit the bulk plants emissions minus point sources and I'll accept EPA's pipeline emissions.

On the NOMAD conf call today Dave Cooly of Abt mentioned that the Unpaved Roads emissions are way over-estimated due to the split between Paved/Unpaved being too heavy on the Unpaved side. I look forward to the adjusted emissions.

Let me know if you have any questions.

Thanks

Ken

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**From:** Eyth, Alison [<mailto:Eyth.Alison@epa.gov>]  
**Sent:** Wednesday, December 16, 2015 10:46 AM  
**To:** Santlal, Kenneth (DEP)  
**Cc:** Wert, Mark (DEP)  
**Subject:** RE: Mass. DEP emissions comments on NODA

Hi Kenneth,

Thanks for letting me know. I understand about getting 2014 NEI work done!  
FYI, we are going to be doing emissions processing for 2011 over the next couple of weeks.

So, if there are to be any changes in our 2011 run for the final ozone transport for 2008 NAAQS, we would need guidance from you within the next week or so. If it's OK for the sources to be left as-is in that run, we are fine and you can take a closer look at those sources for the 2014 NEI. Certainly the dust would have no impact on ozone. I doubt the other categories would have a substantial impact either in your state, so whatever you choose to do is fine.

Alison

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**From:** Santlal, Kenneth (DEP) [<mailto:Kenneth.Santlal@MassMail.State.MA.US>]  
**Sent:** Wednesday, December 16, 2015 10:08 AM  
**To:** Eyth, Alison  
**Cc:** [mark.wert@state.ma.us](mailto:mark.wert@state.ma.us)  
**Subject:** RE: Mass. DEP emissions comments on NODA

Hi Allison,

I'm hoping to finish up my 2014 Nonpoint categories for EIS input by end of year. That should leave me some time to review the 3 categories: Unpaved Roads, Gasoline Bulk Plants/Terminals and Gasoline Pipelines. Most likely for the latter two, I'll try to subtract the Point source emissions from the EPA estimates and submit to NEI.

Thanks

Ken

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**From:** Eyth, Alison [<mailto:Eyth.Alison@epa.gov>]  
**Sent:** Thursday, December 10, 2015 10:24 AM  
**To:** Wert, Mark (DEP); Santlal, Kenneth (DEP)  
**Subject:** Mass. DEP emissions comments on NODA

Mark and Kenneth,

We are trying to address the comments made by MA DEP in response to the NODA (attached).

On the Fugitive dust, we have determined that in our database, MA has more unpaved roads than the surrounding states, and therefore more road dust. However, we are not sure if this might be in error. Do you have any information on the number of miles of unpaved roads in Massachusetts?

On the bulk plants / pipelines, if you have more accurate data for these, we are open to it. In the comment, no alternative values were provided. Do you have any information on what you think these emissions should be? Do you think we need to drop the nonpoint emissions? There could be some sort of point/nonpoint reconciliation issue here.

Any additional guidance / info would help us to finalize these emissions for our next round of modeling.

Thanks!

Alison